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THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA



Solange chadda Candidate independent for the us senate race Pennsylvania 2006 Plaintiff



Vs The board of elections Harrisburg, Pennsylvania

&

Bob casey candidate democrat for the us senate race Pennsylvania 2006

Defendants

CASE No

NOTICE OF MOTION EX PARTE AND MOTION EX-PARTE TO STOP THE ELECTIONS OF THE SENATE RACE AND DELAY FOR SIXTY DAYS AND PUTTING INDEPENDENT CANDIDATE ON THE BALLOT & MEMORANDUM OF LAWS

INTRODUCTION

MEMORANDUM

Plaintiff independent candidate solange chadda bring that action to stop the election of The senate race 2006 and to dealy of 60 days, so plaintiff can be put on the ballot, Due to criminal acts and conducts of defendants candidate democrat bob casey and The boards of elections, violating the Federal Election act and its codes and laws Through criminal acts of estortion, blackmail, abuse of power and obstruction and Corruption.

The us candidate independent plaintiff moves this court for an order to stop the senate race elections and delay for sixty days to put plaintiff on the ballot and bring defendants' Harmful and criminal practices to a swift end.

The plaintiff brings this motion ex parte to stop the elections of the Senate race 2006 Because of the criminal acts and violations of the federal code of election by defendants' Pattern of fraud and criminal activities of estortion, blackmail, corruption... and To delay the Senate race of sixty days to put the plaintiff on the ballot, victim of the Criminal acts of defendants and to allow the democratic party to put a new democrat Candidate for the us senate race.

STATEMENT OF FACTS

SEE FULL COMPLAINT EXHIBIT A

ARGUMENT

The Commission (of election) institue a civil action for a relief including a permanent Or a temporary injunction, order, the defendants have violated the provision of section 9035 and also section 9037.

See the federal code violated by defendants through criminal acts and rules of evidences In the full complaint

FULL COMPLAINT

Defendants have violated the election code through estortion and blackmail see evidences, witnesses, tapes are also available for hearing and the sanctions should Be appropriate towards defendants and also defendant us candidate democrat bob Casey should be sanctioned as well by his abuse of power and his criminal acts.

(see complaint explanation in details and exhibits)

A district Court may issue injunction and order to reinforce the violations of the Federal act of election code.

EX PARTE RELIEF

The ex parte relief is to put candidate independent plaintiff on the ballot to have Been victimised by defendants criminal acts and abuse of power and violations Of the election code by criminal acts of corruption (estortion,blackmail..) and To stop the senate race election 2006 and to delay for 60 days. EX PARTE RELIEF IS NECESSARY HERE

AN EX-PARTE TRO IS WARRANTED WHERE THE FACTS SHOW THAT IRREPARABLE LOSS,OR DAMAGE WILL RESULT BEFORE THE DEFENDANTS CAN BE HEARD IN OPPOSITION see Fedr Civ P.65 (b)

That 's apply to plaintiff she is the victim of the corrupted criminal acts of defendants Who violated the election code of election and thought they can get away with it by Be above the law

(9042,criminal penalties unlawful use of payments kickback and illegal payments section 9037 section 9035 estortion blackmail

Conclusion

The ex parte motion should be heard and the ex parte relief should be taking place Right away towards the victim which is the plaintiff and an order or a temporary Injunction should be taking place to stop the senate race elections and delay for Sixty days in putting the victim the plaintiff on the ballot amd bring charges and Sanctions against the criminal acts of defendants who violated the federal code Of election by their criminal acts (estortion, blackmail...illegal use...) and their Above the law (corruption) and justice should prevail to give to the senate race Elections a fair race without crimes and corruption.

This is true and correct
The plaintiff
Independent candidate and victim

Oct 30th 2006

EXHIBIT

THE FULL COMPLAINT

W EXHIBITS

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Solange chadda Us senate independent candidate Pennsylvania 2006 plaintiff

Vs

The board of elections Pennsylvania 2006

&

Us senate democrat candidate Bob Casey Defendants

CASE No

COMPLAINT

The complaint is to stop and delay the elections of the senate race 2006 in Pennsylvania Through a special motion ex-parte, to get a injunction for stopping and delay the elections Because the candidate Bob Casey democrat has violated the federal code of elections Through criminal acts and the board of elections has ignored the ordeal. The candidate Bob Casey deserved to be disqualified of the results of his criminal acts violating the Federal election code and it should be a new democrat candidate in this elections, the Results of it and the plaintiff being victimised by the defendants should be on the Ballot.

Solange chadda resident in Philadelphia ,Pennsylvania,senate race 2006 as an independent ,plaintiff and Mr Bob Casey democrat candidate us senate race 2006 and the board of elections in Pennsylvania ,Harrisburg.

All parties are residing in Pennsylvania

The state of claim is in Pennsylvania.

Solange chadda is a sawvy business person, being fifteen years in Pennsylvania, in Philadelphia, at the same address. She is an entreprenor in the domaine of fashion (she was a pioneer in the large sizes), and also in the domaine of perfume and cosmetics (solange n9 products) and a taste of the past with her own radio show :"live with solange" (solange was a journalist, even back home, for many years), and as an entreprenor she will be coming soon with her own line of wines. but solange has a savwy taste for politics because she grew up in politics arena and friends and family advised her: she should run and be the first woman in Pennsylvania to fight for a higher office (Pennsylvanian don't like and don't approve women in politics for higher office, they think it is a man job) and to be the first independent as a woman to fight for the people. Solange doesn't believe that there black or white in life, she believes that there is a grey area, which is independent and there are good people and bad people on both sides, on the side of the republican and on the side of the democrats but you cannot justify everything on one direction, solange believes in that.

Α

Solange chadda ,announced publically at a conference in Missouri:Media reform In 2005 ,democratic conference :that she will run for the senate race as an independent.

Exhibit a (flyer)

Exhibit b

Media reform conference

Exhibit c

Endorcement of democrat congresswoman Watson.

В

The democrats approached her through Jaf Raifey via telephone, end of may 2005 To bribe her and get out of the race.

The democrats knew that she will take away democrat voters.

Exhibit d

A witness was there when the phone rang and solange put the conversation on a

Speaker phone. \mathbf{C} Solange attended the june conference:taking back America, democrat conference Exhibit e Taking back conference june 2005 D Through the summer, fall and winter popularity in the streets(the poor, the working Class, the minority....the democrat voters!) Exhibit f Flyer E Solange filed 2006 nomination petition request form, November 14th 2005 Exhibit h 2006 nomination petitition form End of March 2006, first box arrived opened, 3/4 empty Exhibit g The label H Second box arrived weeks later april 2006 to Adrian Seltzer Exhibit h Incident dept of state/board of elections/Adrian Seltzer/democrat Exhibit I Document to that incident Petitions circulation Signatures 95% democrat K

July 2006

CONNECTING THE DOTS WITH BOB CASEY DEMOCRAT CANDIDATE

Chuck Pennachio, candidate democrat in the primaries against Bob casey, met solange In june 2005 at taking back America, the first time.

Chuck Pennachio lost the democrat primaries against Candidate Bob Casey
Chuck Pennachio decided after loosing the primaries to rallye his cause to Bob Casey

Chuck Pennachio works as a closed person to Bob Casey: to rally all the progressive Democrats running in the race Pennsylvania 2006, by the democrats and the DNC.

Chuck Pennachio is working as a closed person to Bob Casey on daily basis to accelerate The victory of Bob casey through the democrats state wide (congress person, state person Ect....

Chuck Pennachio reports only to Bob Casey and also his campaign manager Jaff Raifey.

CHUCK PENNACHIO MET SOLANGE 3 times

408 s 47th street
Take her to Lancaster
Restaurant Le rouge
Café next University of Arts (market street)

Encounter of Chuck Pennachio

Handwriting of chuck Pennachio

Le rouge restaurant

Chuck Pennachio wanted all the petitions including the ones half done, the 100,000 and ask for checks 200,000 on his name, and 200,000 dollars each for each democrat candidates Paul Lang, Lois Herr, a whole list (Chuck Pennachio handwriting) and I will be put on the ballot.

L
exhibits
Affidavit of solange chadda
Affidavit of witness, acquintance of solange chadda, sit next table, heard the
Whole conversation, witness

M

408 south 47th. Meeting of Paul Lang and his right hand at 408 south 47th st with Chuch Pennachio. Paul Lang took 40,000 with the petitions and asked for his check of 200,000. After the petitions were given, Paul Lang said when he gets his check he will give back the petitions and he will talk to Chuck

M Exhibits Paul Lang business card Affidavit of solange chadda

N

Route to Lancaster same day than the visit of Paul Lang at 408 s 47th st Acknowlegement phone call from car to bob casey,rob listened,solange Chadda got awared that chuck pennachio was working for bob casey the Candidate

Exhibit

0

Affidavit of solange chadda

Who is Paul Lang

Paul Lang is a democrat candidate running in the state of Pennsylvania under Bob casey and the Dnc.

p

Driving to Lancaster with Chuck Pennachio(chuck Pennachio's car and Rob (internet democrat newspaper,met him at taking back America),arriving at a democrat gathering,suburb of Lancaster:house of jerry,and the encounter with 50 democrats and also Lois Herr congresswoman candidate democrat with dnc staff from Washington dc solange chadda spoke to the 50 democrats solange chadda gave petitions to Lois Herr staff and Lois Herr said give my check of 200,000 dollars to chuck and I will give him the petitions signed and Chuck Pennachio gave more petitions to Jerry the host democrat

P

Exhibits
Affidavit of solange chadda
Handwriting of Jerry the host
A circulation from the hand of Lois Herr
An handwriting of one of the democrats there

Q

Driving back to Pennsylvania around 1am chuck pennachio, Rob, solange chadda Chuck Pennachio keeping the rest of petitions signed and unsigned

R

The café next of the university of arts the next day with chuck pennachio First discussing to go in 2 days to pittsburg,erie,penn state to meet the Other candidates (candidates handwriting of chuck pennachio,all democrats Candidates under bob casey)

Suddendly Chuck Pennachio said: I need all the checks in my name and on The candidate names: he was talking to himself, Paul Lang, Lois Herr, Serpico, Sloan Slide...a lot of checks...

Solange chadda told him: I explained to you that as an independent candidate I cannot support democrat candidate because I will be disqualify, especially Candidate run by the democrat party, official candidate.

Chuck Pennachio, livid.....

:give me the checks now,now the checks...I need these checks...Chuck Pennachio was loosing it....

I am keeping all the petitions signed and unsigned, all these candidates they report To me and Bob casey, you are nothing, we are keeping in hostage the petitions and We will stop you to be on the ballot, we have friends at the dept of state, you are Out of the race and you are going to be killed watch the streets, he even threw his café on the floor with the cup!

Estortion, Blackmail....what a day! And death threats I lost everything that I worked for said solange chadda

Exhibit

Q

Affidavit of solange chadda

Affidavit of a witness who came forward at the café after chuck pennachio left

S

Solange called the state explaining the events to have more petitions (boards of elections)

V

Solange called the police and went to the DA and called the higher authorities

Exhibit R

Police report

Exhibit S

Affidavit of solange went to the DA Affidavit of solange chadda higher authorities

W

Solange called again the board of elections mentioning higher authorities Jonathan Marks dept of state(elections) called back at that point and said he will Give petitions to solange chadda but she will have to come to Harrisburg 21rst Of july 2006,less than a week away to start from scratch. Solange chadda got Robbed through estortion and blackmail of democrat working for Bob casey

Exhibit V Solange chadda went to Harrisburg

Bob casey and candidates under Bob casey, democrats violated the federal election Code through criminal acts of estortion, blackmail.

 \mathbf{Z}

The board of elections didn't give enough petitions to be on the ballot after being' Robbed and blackmail and estort by the candidates democrat working for bob casey Solange chadda on july 26th went to see a lawyer

Exhibit V

Copy of the lawyer letter sent to the board of elections

Z(1)

August 1rst filing with the board of elections as candidate

Exhibit W
All documents
Including the entry fees

Z(2)

No response, none to solange chadda, none to solange chadda's lawyer, the board Of elections and the court of elections played dead from august 1rst to present.

WHO IS BOB CASEY

Bob casey is a son of a governor and an audit for the state of Pennsylvania, Democrat who run under the "cotta of his father's name" and has access to All kinds of money, banks..favors...being an audit and having access to the Money of the taxpayers and the employees of the state ,in evry city and Every city hall and mayor offices.

Bob casey is a resident of Scranton, Pennsylvania and Harrisburg, Pennsylvania

THE BOARD OF ELECTIONS

Harrisburg, Pennsylvania

Since Governor Rendell got elected, Harrisburg is Philadelphia city all, all Democrats, doing favors on favors, 95% on rendell's orders, 95% democrat Rendell endorced Bob Casey publically and pushed away all democrats Who could make loose Bob Casey in exchange of favors...including Financial (articles in Philadelphia inquirer and others)

STATEMENT OF FACTS WHY SOLANGE CHADDA INDEPENDENT CANDIDATE WAS A PROBLEM FOR BOB CASEY DEMOCRAT CANDIDATE

Exhibits Z
Democratic flyer
Democratic website
Democratic federal bills
The Tree (see design) (comparaison)

DEFENDANT'S ILLEGAL PRACTICES

A/ attempt of bribery

B/robbing all the petitions through estortion ,blackmail...criminal act

C/abuse of power and telling the board of elections what to do :ignoring lawyer's letter And candidate's papers/obstruction of justice

D/corruption acts

E/Violation of election code through criminal conduct and criminal crime

RESULTS

The results will drive candidate democrat bob casey to be disqualify and the dnc Put a brand new candidate into the race

The results to stop the elections of the senate race and delay for 60 days, to Put the victim of the violations of the election code by criminal conduct of the Dit candidate democratand covered by the board of the elections....to Put the victim candidate independent solange chadda on the ballot

A District Court may issue injunction to reinforce the violations of the federal Code of elections by defendants

Also defendants through their candidates Bob Casey, Chuck Pennachio, Paul Lang, Lois Herr and other mentioned earlier including the handwriting of Chuck pennachio have Violated other aspects of the elections
Unlawful use of payments, kickbacks and illegal payments

It is unlawful for any person who receives any payment under section 9037 (or to Estort such payment) and or to whom any portion of any such payment is <u>Transferred,knowingly</u> and willfully to use and authorize the use of such payment

It is unlawful for any person knowingly and willfully to give or accept any kickback Or any illegal payment in connection with any qualified campaign expense of a Candidate who received payments under section 9037 And the money cannot exceed also per candidate 2000 dollars

Conclusion

Solange chadda independent candidate was never approached or sollicitaded or Bribe by candidate us senator rick santorum, the republican knew she was an Independent candidate in the race for the us senate Pennsylvania 2006, but the republicans were acting as gentlemen and honest and straight forward people Toward her.

The Board of elections and the democrat candidate Bob Casey have violated The federal code of election by criminal acts of estortion, blackmail and Obstruction of justice and abuse of power, they should be sanctioned and This us senate election should be stopped and delayed for sixty and candidate Independent solange chadda should be put on the ballot and the Dnc should put A new candidate as democrat in the race and Mr Bob casey and his corrupted Encounters should be disqualified of this race.

This is true and correct
Solange chadda
Candidate independent for the us senate race 2006
Oct 3oth 2006
408 south 47th street
Philadelphia pa 19143